

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION

CRAIG SHIPP

PLAINTIFF

VS.

NO. 4:18-CV-0417 SOH

CORRECT CARE SOLUTIONS, LLC,
DR. LORENE LOMAX, DR MIMO LEMDJA,
KIMBERLY HOFFMANN, LENORA PHILSON,
KINDALL SMITH, DIANE CUNNINGHAM,
MELISSA STONER, STEVE ARNOLD

DEFENDANTS

ORAL DEPOSITION

OF

CRAIG SHIPP

TAKEN NOVEMBER 14, 2018, AT 10:06 A.M.

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COPY

1 to the warden.

2 Q Did you speak to your family at all during this time
3 period?

4 A You could only -- well, through February you could not
5 make phone calls.

6 Q So while you were on 4 South --

7 A Yeah, I wrote --

8 Q -- no phone calls?

9 A I wrote. That was the only way to contact them.

10 Q Okay. When did you first write them?

11 A As soon as we got out of the intake quarantine.

12 Q Okay. Do you remember telling someone that you had
13 written your family on February 7th to ask them to send your
14 shoes?

15 A No. I don't remember if I told anybody.

16 Q All right. What were you asking from your family when you
17 wrote them letters?

18 A Asking them to, you know, call and see about getting those
19 sent, you know, to me.

20 Q Okay. Did they write you back?

21 A Yes, they wrote me back.

22 Q Okay. What did they -- what did your family say?

23 A They said they were trying to, but the -- you know, the
24 warden hadn't approved them, basically. My sister even called
25 them.

1 -- well, she was already seeing the bloody foot, you know, had
2 seen what had happened to that. And the right foot was the
3 one, you know, that was even in worse shape I thought, you
4 know. I already knew it was in worse shape.

5 And basically she was like, "I'm not supposed to, you
6 know, even see you here today." That's why she -- she repeated
7 that, that's why Nurse Kindall got me the elevator pass.

8 Q Okay. Did she say anything about contacting your family,
9 Dr. Lemdja?

10 A Not that I remember.

11 Q Okay. If Ms. Kindall made a note that the doctor made a
12 reference to contacting your family, would you have any reason
13 to dispute that?

14 A I don't know what they have on my records.

15 Q Okay. Well, did numerous people in Medical mention
16 contacting the warden or contacting your family?

17 A It was the warden mostly.

18 Q The warden?

19 A Yeah.

20 Q Okay. Now, let's move on to Dr. Lomax. What is it -- I'm
21 trying to think of your testimony -- so what is it that you
22 think Dr. Lomax did wrong?

23 MR. FRANSEEN: Object to form.

24 A Basically she could have helped me get the shoes, you
25 know. That's --

1 Q Okay. Would you also agree that this is the form that you
2 submitted?

3 A Yeah.

4 Q Okay. What's the date on that form?

5 A The 2nd and 3rd.

6 Q Okay. February 3rd; correct?

7 A Yes.

8 Q All right. Now, in that request you are seeking treatment
9 for what?

10 A Description of the problem was deformed feet due to
11 charcot joint and also diabetes.

12 Q All right. Now, after you submitted that request, were
13 you seen by Medical?

14 A Yeah. I would have been seen by them.

15 Q And would it be about February 5th --

16 A Yeah.

17 Q -- would you agree? Now, who did you see during that sick
18 call, do you remember?

19 A I do not remember.

20 Q That's perfectly okay. Do you recall during that sick
21 call visit being told to notify your family about your shoes?

22 A No.

23 Q Do you recall seeing the doctor again on February 12th?

24 A No. I don't remember the exact dates.

25 Q You don't remember the exact date? I want to record it,